

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,
VA 07/20/2016 DEPARTMENT 47
Plaintiff,

vs.

1. LSJB INVESTMENTS, LLC,
A LIMITED LIABILITY CORPORATION
2. CAROL JEAN ALSMAN
Aka CAROL JEAN WALLACE
[F; 12/11/1938]

LAMC §91.103.3*
(SIX TOTAL COUNTS)

Defendant(s).

MISDEMEANOR COMPLAINT

CASE NUMBER: 6CJ01778

FILED
SHERRI R. CARTER
Executive Officer/Clerk

By _____
Deputy Clerk

Issued by
MICHAEL N. FEUER
City Attorney

By 
DAVID SHEPHERD
Deputy City Attorney/rcid

COMES NOW the undersigned and states that he is informed and believes, and upon such information and belief declares: That on or about 01/28/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit,

violation of Section 91.103.3 of the Los Angeles Municipal Code was committed by the above-named defendant(s), who at the time and place last aforesaid, did unlawfully fail to comply with a valid order issued pursuant to a provision and requirement of the Los Angeles Municipal Code, to wit: #555953, issued on 01/15/2016.

TCIS 91.103.3/01

*LAMC §§91.103.3, 12.21A1(A), 91.8203, 151.24(A), 151.27(B) and 151.26(A).

COUNT II

For a further, separate and second cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 04/07/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit,

violation of Subsection A1(a) of Section 12.21 of the Los Angeles Municipal Code was committed by the above-named defendant(s), who at the time and place last aforesaid, did unlawfully maintain a building and structure, and use and design to be used a building, structure, and land for other than was permitted in the zone in which such building, structure, and land was located, without applying for and securing all permits and licenses required by all laws and ordinances, to wit: using the structure at 500 - 502 ½ N. **GENESEEE AVENUE, LOS ANGELES, CALIFORNIA 90036** as a transient occupancy residential structure which is not allowed in an RD 1.5 zone.

MCI 12.21A1(A)/01

COUNT III

For a further, separate and third cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 04/07/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, to wit,

violation of Section 91.8203 of the Los Angeles Municipal Code was committed by the above-named defendant(s), who at the time and place last aforesaid, being the owner, manager, and person in control of a building located at **500 - 502 ½ N. GENESEEE AVENUE, LOS ANGELES, CALIFORNIA 90036**, did unlawfully fail to obtain a new Certificate of Occupancy for a change of occupancy to one classified in a different group and a different division of the same group as described in Division 3 of the LAMC which adopts Chapter 3 of the CBC by reference, to wit: changed the occupancy from an R-2 apartment house to an R-1 hotel (transient) without acquiring a new Certificate of Occupancy.

MCI 91.8203/01

COUNT IV

For a further, separate and fourth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 04/07/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, pursuant to LAMC Section 151.10B, to wit,

violation of Section 151.24A of the Los Angeles Municipal Code was committed by the above-named defendant(s), who at the time and place last aforesaid, did unlawfully fail to file with the Housing and Community Investment Department a notice of intention to re-rent withdrawn accommodations on a form prescribed by the Housing and Community Investment Department prior to offering, renting and leasing a rental unit that was subject to a notice of intent to withdraw pursuant to the provisions of Subsection A of LAMC Section 151.23, to wit: 500 - 502 ½ N. GENESEE AVENUE, LOS ANGELES, CALIFORNIA 90036.

TCIS 151.24(A)/01

COUNT V

For a further, separate and fifth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 04/07/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, pursuant to LAMC Section 151.10B, to wit,

violation of Section 151.27B of the Los Angeles Municipal Code was committed by the above-named defendant(s), who at the time and place last aforesaid, did unlawfully fail to first offer to rent and lease each unit at 500 - 502 ½ N. GENESEE AVENUE, LOS ANGELES, CALIFORNIA 90036 to the tenant and tenants who were previously displaced from that accommodation, less than five (5) years prior by a withdrawal of the units from the rental market, before offering such accommodations to the general public for rent and lease. To wit: offered and rented units at 500 - 502 ½ N. GENESEE AVENUE on a website operated by AIRBNB.

TCIS 151.27(B)/01

COUNT VI

For a further, separate and sixth cause of action being a different offense, belonging to the same class of crimes and offenses set forth in Count I hereof, affiant further alleges that on or about 04/07/2016 at and in the City of Los Angeles, in the County of Los Angeles, State of California, a misdemeanor, pursuant to LAMC Section 151.10B, to wit,

violation of Section 151.26A of the Los Angeles Municipal Code was committed by the above-named defendant(s), who at the time and place last aforesaid, did unlawfully rent and lease units at **500 - 502 ½ N. GENESEE AVENUE, LOS ANGELES, CALIFORNIA 90036**, within five (5) years after filing a notice of intent to withdraw the accommodations from the rental market and within five (5) years after withdrawal of the accommodations from the rental market, for an amount greater than the lawful rental amount, plus annual adjustments, in effect at the time that a notice of intent to withdraw the accommodations was filed with the Housing and Community Investment Department. To wit: advertised and rented a unit at 500 - 502 ½ N. GENESEE AVENUE for \$558.00 for a one night stay.

TCIS 151.26(A)/01

All of which is contrary to the law and against the peace and dignity of the People of the State of California. Declarant and complainant therefore prays that a warrant may be issued for the arrest of said Defendant(s) and that he/she may be dealt with according to law.

Attached hereto and incorporated by reference as though fully set forth are written statements and reports which constitute the basis upon which I make the within allegations.

A declaration in support of the issuance of such warrant is submitted. I declare under penalty of perjury that the foregoing is true and correct.

Executed at Los Angeles, California on 6/13/16.



DAVID BRANDON

INFORMAL DISCOVERY NOTICE

TO THE ABOVE-NAMED DEFENDANT(S) AND/OR ATTORNEY(S) FOR DEFENDANT(S):

Plaintiff, the People of the State of California, hereby requests discovery/disclosure from the Defendant(s) and his or her attorney(s) in this case pursuant to Penal Code Sections 1054.3 and 1054.5.

YOU ARE HEREBY NOTIFIED that if complete disclosure is not made within 15 days of this request, Plaintiff will seek - on or before the next Court date, or as soon as practicable thereafter - a Court order enforcing the provisions of Penal Code Section 1054.1, subdivisions (b) and (c). This is an ongoing request for any of the listed items which become known to the Defendant(s) and his or her attorney(s) after the date of compliance.

The written statements and reports attached hereto constitute discoverable materials designated in Penal Code Section 1054.1. Any additional material discoverable pursuant to Penal Code Section 1054.1 that becomes known to Plaintiff will be provided to the defense.

If, prior to or during trial, as a result of this request Plaintiff obtains additional evidence or material subject to disclosure under a previous defense request or Court order pursuant to Penal Code Section 1054.1, Plaintiff will disclose the existence of that evidence or material within a reasonable time.

DISCOVERY MATERIALS SHOULD BE DELIVERED TO A DEPUTY CITY ATTORNEY IN MASTER CALENDAR COURT ON THE FIRST TRIAL DATE.